

Applicants: Lee et al.  
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Docket No.: ZIL-571

### REMARKS

Reconsideration and allowance is respectfully requested. Before entry of this amendment, claims 1-21 were pending. In the Office Action, claims 1-21 were rejected. In the present amendment, claims 17-18 are amended, and claims 22-24 are added. After entry of the amendment, claims 1-24 are pending.

#### I. Claims 1, 3-6 and 17-21

Claims 1, 3-6 and 17-21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Harris et al. (US Pat. Pub. 2001/0033243) in combination with Sato (USP 6,408,435 B1) (Office Action, p. 3, lines 1-3). The combination of Harris and Sato does not form the basis for a valid rejection of claims 1, 3-6 and 17-21 under § 103(a) because the references when combined do not teach or suggest all of the claim elements.

#### A. Independent claims 1 and 17

Claim 1 recites, a "hypertext document including an indication of a selection criterion of a group of codesets, . . . selecting a plurality of codesets of the group of codesets using the designation of the selection criterion" (emphasis added). Claim 17 as amended recites, "means for transmitting a first hypertext document from the server software to the web browser and for receiving a second hypertext document from the web browser, wherein the first hypertext document includes an indication of a selection criterion for the first group of codesets, and wherein the second hypertext document includes a designation of the selection criterion for the first group of codesets" (emphasis added).

The combination of Harris and Sato does not form the basis for a valid rejection of either claim 1 or claim 17 because neither reference teaches a designation of a selection criterion of a group of codesets.

Harris does not teach a hypertext document that includes a designation of a selection criterion of a group of codesets. Instead, control station 40 of Harris

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allows a user to determine the type, brand and model of individual electronic devices and then to generate "configuration data" to control the individual electronic device. Harris does not teach entering a designation into a web page that designates more than one electronic device at a time. In Harris, device information is entered for individual electronic devices identified by type, brand and model. Harris explains:

"[0082] . . . control station 40 analyzes the sample data to determine the type, brand and model of each of the electronic devices 12 that are controlled by the corresponding sampled signal. Once the control station 40 has determined what the type, brand and model of each of the electronic devices 12 is, the control station 40 then generates "configuration data" that is then downloaded to the electronic system 100. . . .

[0084] As shown in FIGS. 11 and 12 of the drawings, the user may avoid sampling the signal from each of the remote controls and instead directly enter product information into the web page of the control station 40. The user preferably enters relevant product information such as but not limited to device type (e.g. VCR, television, DVD player, etc.), brand (e.g. SONY, TOSHIBA, etc.), and model.

[0085] Once the all of the device information has been entered for each of the electronic devices 12, the user then connects the electronic system 100 to the Internet via the network interface 112, the communication device 108 or other means. The electronic system 100 may be directly or indirectly connected to the Internet as shown in the figures.

[0086] Once the control station 40 has determined what the type, brand and model of each of the electronic devices 12 is, the control station 40 then generates "configuration data" that is then downloaded to the electronic system 100." (Harris, paragraphs [0082] – [0086])

Thus, Harris does not teach selecting a plurality of codesets using a designation of a selection criterion of a group of codesets. The Examiner acknowledges that Harris does not teach a designation of a group of codesets. The Examiner states, "Harris differs from the claims by not specifying the configuration data as codesets of a group." (Office Action, p. 3, lines 15-16) (emphasis added).

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Sato also does not teach a hypertext document that includes a designation of a selection criterion of a group of codesets. The Examiner states, "Sato discloses a similar Internet downloaded programmable remote control with similar selection and providing download of codesets from a group from a sever over the internet using hypertext to allow control of plural registered devices. See cols. 5-9. The code data in fig. 9 represents plural groups." (Office Action, p. 3, lines 17-21). Applicants respectfully disagree. Sato teaches neither designating a group of codesets nor downloading a designated group of codesets.

Sato is directed to attaching, to a web page, "commands" that are used to reserve a desired television program title. The commands sent to interface box 25 of Sato are not codes of codesets. Sato distinguishes between "commands for determining behaviors of electronic devices" and "code data" that controls the electronic devices.

"As referred to above, codes and carriers for controlling electronic devices are different among different manufacturers and even among different devices from the same manufacturer depending on types and dates of fabrication. On the other hand, commands sent to the interface box 25 determine respective modes of operation of devices commonly to all devices regardless of manufacturers or types. Therefore, interpretation of commands and conversion of commands to codes and carriers acceptable for individual devices are required." (Sato, col. 6, line 62 – col. 7, line 4) (emphasis added)

Sato uses web pages to choose commands, not to choose codesets. Thus, Sato teaches selecting "commands for determining behaviors of electronic devices" and does not teach selecting a group of codesets. Sato explains:

"Moreover, according to the invention, commands for determining behaviors of electronic devices are attached on WWW pages from broadcasting stations. When a portion with a command is clicked, an infrared signal corresponding to the command is transmitted, and a target electronic device is set in a desired mode. As a result, a user can readily attain reservation of a desired program, visually confirming necessary information on a WWW page, for example." (Sato, col. 10, lines 12-19)

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The infrared signals that correspond to the "commands" of Sato are the infrared signals used to set up the electronic devices to record a desired television program. And the "code data" used to generate the infrared signals is not selected by sending a designation of a selection criterion of a group of codesets in a WWW page over Internet 6. In Sato, after the "commands" are selected using a WWW page, "code data" already present in interface box 25 is used to control the electronic devices in order to record the television program according to the "commands". The procedure in Sato is as follows: (i) a television program title is selected using a WWW page, (ii) the program title is associated with a "G code", and then (iii) the "G code" is used to point to memory addresses in code storage portion 52 of interface box 25 that contain "code data" for individual infrared signals. Sato explains that a "G code" is a so-called Gemstar code assigned to an individual television program. (Sato, col. 1, lines 24-25). Sato explains further:

"Assume here that the VTR 11 of the audio/visual system 5 shown in FIG. 1 is a product fabricated by manufacturer A in a year from 1985 to 1990 and that the WWW page as shown in FIG. 2 is shown on the display 22 of the personal computer 21 and the title 32A on the WWW page is clicked. In this case, a command equivalent to "142" of the G code system is sent from the personal computer 21 to the interface box 25.

In case of the VTR manufactured by manufacturer A between years 1985 and 1990, the code data equivalent to "142" of the G code system is those registered in addresses "A7, A10, A8". Therefore, code data stored at addresses "A7, A10, A8" among others stored in the code storage portion 52 shown in FIG. 8 is read out.

The code data is sent to the infrared signal generator 54, and an infrared signal from the infrared signal generator 54 is transmitted to VTR 11. As a result, G code "142" is set in VTR 11." (Sato, col. 7, lines 40-57)

Thus, the designation of title 32A does not select a group of codesets. Moreover, a group of codesets is not downloaded from a web server when title

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32A is clicked on a WWW page, as the Examiner suggests. Instead, the designation of title 32A selects a television program that can be recorded using infrared signals generated with "code data" stored in certain memory addresses indicated by the "commands".

The Examiner suggests that the code data shown in figure 9 of Sato represents a group of codesets downloaded from a server over the Internet using hypertext to select the group of codesets. (Office Action, p. 3, lines 17-21). The "code data" of figure 9 of Sato, however, does not represent a group of codesets that has been selected or designated using hypertext. Rather, the "code data" shown in figure 9 represents all code data of all devices. Sato does not teach that a selected group of codesets is stored in code storage portion 52 of interface box 25. Sato describes the "code data" shown in figure 9 as follows:

"As shown in FIG. 9, the code storage portion 52 stores code data (information on codes and carriers) of infrared signals for difference devices of different manufacturers. That is, codes and carriers used for controlling electronic devices with infrared signals are different among manufacturers. Even for devices from the same manufacturer, codes and carriers are often different among types of devices and those having different fabrication dates. The code storage portion 52 stores all code data of all devices of different manufacturers as shown in FIG. 9." (Sato, col. 6, lines 42-51)

Because neither Harris nor Sato teaches a designation of a selection criterion of a group of codesets, reconsideration of the § 103(a) rejection and allowance of claims 1 and 17 are requested.

#### B. Dependent claims 3-6

Claim 6 recites, "transmitting the selected plurality of codesets to the web client". Neither Harris nor Sato teaches transmitting a selected plurality of codesets. Harris does not teach selecting a plurality of codesets. Thus, Harris cannot teach transmitting a selected plurality of codesets. Sato teaches that code data for one electronic device is down-loaded from a FTP server. (Sato, col.

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8, lines 64-65). But Sato does not teach that a plurality of codesets is selected, or that such a selected plurality of codesets is transmitted.

In addition to the reasons stated above, claims 3-6 depend from claim 1 and are allowable for at least the same reasons for which claim 1 is allowable. Reconsideration of the § 103(a) rejection and allowance of claims 3-6 are requested.

#### C. Dependent claims 18-21

Claims 18-21 depend from claim 17 and are allowable for at least the same reasons for which claim 17 is allowable. Reconsideration of the § 103(a) rejection and allowance of claims 18-21 are requested.

#### II. Dependent claim 2

Dependent claim 2 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Harris in view of Sato, and further in view of Tessier et al. (USP 5,629,868) (Office Action, p. 4, lines 4-7). Dependent claim 2 includes the following limitation of base claims 1, a "hypertext document including an indication of a selection criterion of a group of codesets, . . . selecting a plurality of codesets of the group of codesets using the designation of the selection criterion" (emphasis added).

As explained with regard to claim 1, neither Harris nor Sato teaches a designation of a selection criterion of a group of codesets.

Moreover, Tessier does not teach a designation of a selection criterion of a group of codesets. Tessier teaches repetitively transmitting control sequence data for various appliances to a converter/controller circuit 18. Then the control sequence data for a single selected appliance is loaded into the microcontroller memory of a remote control. (Tessier, col. 5, 45-62). Control sequence data for each additional selected appliance is loaded one-at-a-time until the memory of the remote control is full. (Tessier, col. 6, lines 15-17). Tessier also teaches an embodiment in which all of the control sequences are transmitted to a remote

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control, but "a digital filter" determines which control sequence data are stored in the microcontroller memory of the remote control. The digital filter of Tessier, however, does not teach the recited designation of a selection criterion of a group of codesets.

Because none of Harris, Sato or Tessier teaches a designation of a selection criterion of a group of codesets, reconsideration of the § 103(a) rejection and allowance of claim 2 are requested.

### III. Claims 7-13 and 14-16

Claims 7-13 and 14-16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Harris in view of Sato and further in view of Darbee (USP 5,228,077) and/or Huang (USP 6,640,144) (Office Action, p. 4, lines 15-18).

#### A. Dependent claims 7-13

Claim 8 recites, "transmitting the encrypted plurality of strings of timing information". The Examiner does not state that any of the references teaches encrypting a string of timing information. And in fact none of Harris, Sato, Darbee or Huang teaches transmitting an encrypted string of timing information.

Claim 12 recites, "transmitting a signal engine to the web client". The Examiner states, "Darbee discloses a remotely upgradable universal remote control. Upgrading or programming includes writing instructions and code data to RAM received from a remote source. The instructions include a signal engine for transmitting the code data. The code data includes plural protocols / schemes with strings of timing information. This provides updating of the remote control software for new equipment. See cols. 8-10." (Office Action, p. 4, line 19 – p. 5, line 2) (emphasis added). The Examiner has not presented a *prima facie* case of obviousness because the Examiner has not stated that Darbee teaches transmitting a signal engine to a web client. Instead, the Examiner has stated only that Darbee teaches a signal engine being received from a remote source. Columns 8-10 of Darbee teach that RAM 54 of remote control device 10 is

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programmed by coupling programming computer 200 to RAM 54 via cable 202 and a special connector 204. The coupling of a remote control device to a programming computer via a cable and a special connector does not teach transmitting a signal engine to a web client.

In addition to the reasons stated above with regard to claims 8 and 12, dependent claims 7-13 depend directly or indirectly from claim 1 and are allowable for the same reasons as claim 1 is allowable. Dependent claims 7-13 include the following limitation of base claims 1, a "hypertext document including an indication of a selection criterion of a group of codesets, . . . selecting a plurality of codesets of the group of codesets using the designation of the selection criterion" (emphasis added).

As explained with regard to claim 1, neither Harris nor Sato teaches a designation of a selection criterion of a group of codesets. Moreover, Darbee does not teach a designation of a selection criterion of a group of codesets. Darbee teaches inputting infrared codes into the RAM of a remote control, but does not teach a selection criterion for a group of codesets.

Finally, Huang does not teach a "hypertext document including an indication of a selection criterion of a group of codesets". Huang teaches selecting a subset of the command codes stored in a database on a computer, but does not teach including a selection criterion for a group of codesets in a hypertext document. When considered with the other limitations of claims 7-13, the inventions as a whole are significantly different than the teachings of Huang.

In addition to the reasons given above for claims 8 and 12, the 4-way combination of Harris, Sato, Darbee and Huang does not form the basis for a valid rejection of claims 7-13 under § 103(a) because none of Harris, Sato, Darbee or Huang teaches a hypertext document including an indication of a selection criterion of a group of codesets as well as a designation of the selection criterion of the group of codesets. Reconsideration of the § 103(a) rejection and allowance of claims 7-13 are requested.



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B. Independent claim 14

Claim 14 recites, a "hypertext document including an indication of a selection criterion of a group of codesets . . . receiving onto the web server a designation of the selection criterion from a web client . . . and (f) transmitting the encrypted plurality of strings of timing information to the web client" (emphasis added). The 4-way combination of Harris, Sato, Darbee and Huang does not form the basis for a valid rejection of claim 14 under § 103(a) because none of Harris, Sato, Darbee or Huang teaches either (i) a hypertext document including an indication of a selection criterion of a group of codesets, or (ii) transmitting an encrypted plurality of strings of timing information to a web client.

As explained above with regard to other claims, none of Harris, Sato, Darbee or Huang teaches a hypertext document including an indication of a selection criterion of a group of codesets.

The Examiner has also not presented a *prima facie* case of obviousness because the Examiner has not stated that at least one of the cited references teaches transmitting an encrypted plurality of strings of timing information to a web client. None of Harris, Sato, Darbee or Huang teaches transmitting encrypted strings of timing information.

Because the cited references do not teach all of the recited claim limitations, reconsideration of the § 103(a) rejection and allowance of claim 14 are requested

C. Dependent claims 15-16

Claims 15-16 depend directly or indirectly from claim 14 and are allowable for at least the same reasons for which claim 14 is allowable. Reconsideration of the § 103(a) rejection and allowance of claims 15-16 are requested

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IV. New claims 22-24

Applicants are adding new claims 22-24, each of which is supported by the specification and allowable over the cited references. No new matter is added.

V. Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully submit that the entire application (claims 1-24 are pending) is in condition for allowance. Applicants respectfully request that a timely Notice of Allowance be issued in this case. If the Examiner would like to discuss any aspect of this application, the Examiner is requested to contact the undersigned at (925) 550-5067.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

By

  
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